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Sent: Wednesday, January 25, 2012 10:11 AM

To: ECY RE WW SW Manual Comments; Graul, Carrie (ECY)

Subject: Low Impact Development (LID) requirements: my support and recommendations for expanded requirements

Department of Ecology:

I support the inclusion of new Low Impact Development (LID) requirements and expanded requirements to monitor discharges, and elimination of the 1 acre exemption for Phase II small municipality jurisdictions in the Draft Municipal Stormwater Permits.

These are essential elements of a successful program.

However, to address the pollution adequately the following changes need to be made:

1. Eliminate the very broad " feasibility" and " competing needs" exemptions. These loopholes and others will allow jurisdictions and developers to evade low impact development requirements.
2. Include specific requirements for developers to avoid destruction of native plants and reduce total paved surfaces on building sites. These core foundations of good LID approaches are necessary for the LID techniques to succeed.
3. Strengthen the requirements for " watershed/basin " planning to protect forested areas and green spaces.

Regards,
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